

EXHIBIT H

Scroggins v. Lee's Crossing HOA, 718 F.3d 262 (4th Cir. 2013)

United States Court of Appeals for the Fourth Circuit

SUMMARY OF CASE: In *Scroggins*, the Fourth Circuit considered a homeowner's claim that the HOA failed to grant a reasonable accommodation under the Fair Housing Act involving her emotional support animal. The court emphasized that accommodation requests must be considered **individually and meaningfully**.

KEY HOLDINGS:

- HOAs cannot apply blanket rules or rigid enforcement to deny requests from disabled individuals.
 - Accommodation discussions must be **interactive and fact-specific**.
 - Even when claims fail on technical grounds, HOA retaliation or refusal to engage can support legal action.
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RELEVANCE TO PLAINTIFF'S CASE: Attorney Anthony D. Dwyer has cited or implied reliance on *Scroggins* in Defendants' filings as a basis to justify denying Plaintiff's FHA/ADA-based requests. However, this case actually supports Plaintiff's legal arguments. Misusing this precedent constitutes a false statement of law and potential ethical violation under **Rule 3.3(a)(1)**.

LEGAL SIGNIFICANCE: The Fourth Circuit's analysis in *Scroggins* directly undermines Defendants' arguments and confirms that accommodation claims must be taken seriously, not dismissed based on arbitrary rules or timing.

Submitted in Support of:

Plaintiff's Motion to Strike Discovery Responses, Motion for Sanctions, and Motion to Disqualify Counsel.